

**EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**JANE UNTHSC-CE DOE,**  
prior alias herein for  
**ERICA (Muse) CHUSTZ**  
*Plaintiff,*

v.

**THE UNIVERSITY OF NORTH  
TEXAS HEALTH SCIENCE  
CENTER AT FORT WORTH and  
KIRK BARRON**  
*Defendants.*

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**C.A. No. 4:20-cv-00519-A**

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**DECLARATION IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT**

1. I, TERRY P. GORMAN declare under penalty of perjury that the following facts are true and correct.

2. I am the attorney of record for Plaintiff ERICA (Muse) CHUSTZ (“Chustz”) previously referred to in this matter as Jane UNTHSC-CE DOE.

3. The Complaint in this matter was served on Defendant **THE UNIVERSITY OF NORTH TEXAS HEALTH SCIENCE CENTER AT FORT WORTH** (“UNTHSC”) on September 8, 2020 (ECF # 13), no response has been served within the time allowed by law nor has Defendant UNTHSC sought additional time within which to respond, and Default has been requested against Defendant UNTHSC on January 11, 2021.

4. The Complaint in this matter was served on Defendant **KIRK BARRON** (“Barron”) on September 8, 2020 (ECF # 14), no response has been served within the time allowed by law nor has Defendant Barron sought additional time within which to respond, and Default has been requested against Defendant UNTHSC on January 11, 2021.

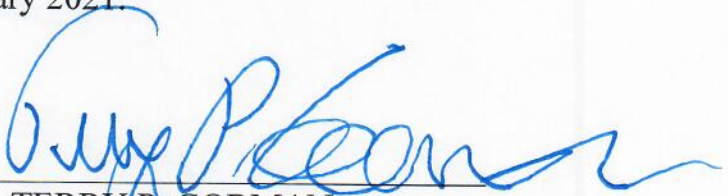
5. Plaintiff seeks no monetary recovery from Defendants but does seek the requested equitable relief that:

- a. Defendants be ordered to remove from all of Plaintiff Chustz records at Defendant UNTHSC [within the Master’s Degree In Physician’s Assistant Studies which Plaintiff successfully graduated from] all evidence that Plaintiff was ever the subject of any failing coursework or dismissal matter while attending Defendant UNTHSC; and
- b. Defendants’ revise Plaintiff Chustz’ transcript and other appropriate records to reflect an INCOMPLETE in lieu of any failing grade noted therein; and
- c. Defendants strike all negative information, emails, evaluations, and materials as to Plaintiff Jane from the records of Defendant UNTHSC.

6. I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

FURTHER DECLARANT SAYETH NOT.

Executed on the 11 day of January 2021.

  
TERRY P. GORMAN